

EXHIBIT B

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO, EAST COUNTY REGIONAL CENTER

MARY GIORDANO, individually and)	
on Behalf of the Estate of)	
Jacqueline Keith and other)	
qualified survivors,)	
)	
Plaintiffs,)	Case No.
vs.)	37-2011-00069363-CU-PO-EC
)	
C.R. BARD, INC., a corporation,)	
BARD PERIPHERAL VASCULAR, INC.,)	
a corporation, THOMAS BRANNIGAN,)	
M.D., an individual, FRANKLIN)	
KALMAR, M.D., an individual,)	
JULIE LAIDIG, M.D., an)	
individual, SHARP GROSSMONT)	
HOSPITAL, a corporation,)	
SHARP HEALTHCARE, a corporation,)	
and DOES 1 through 100 inclusive,)	
)	
Defendants.)	
)	

- - -

February 5, 2014

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Videotaped Deposition of JOHN McDERMOTT, held at
100 Bayview Circle, Suite 5600, Newport Beach,
California, commencing at 10:04 a.m., on the above date,
before Kimberly S. Thrall, a Registered Professional
Reporter and Certified Shorthand Reporter.

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1 APPEARANCES:

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12 FOR DEFENDANTS C.R. BARD, INC. and BARD PERIPHERAL
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25

1 Dr. Laidig.

2 THE VIDEOGRAPHER: Counsel will be noted on the
3 stenographic record.

4 The court reporter is Kim Thrall, and she will
5 now swear in the witness.

6

7 JOHN McDERMOTT,
8 having been first duly sworn, testified as follows:

9

10 EXAMINATION

11 BY MR. LOPEZ:

12 Q. Good morning.

13 A. Good morning.

14 Q. Mr. McDermott, right, not Dr.?

15 A. No.

16 Q. Okay.

17 A. Mr. is fine.

18 (McDermott Exhibit 1 was marked.)

19 BY MR. LOPEZ:

20 Q. All right. You were served with a subpoena in
21 this case, and I've premarked that as Exhibit 1, and
22 you'll note that it asked you to produce a number of
23 documents.

24 Do you see that?

25 A. Where exactly in this do you want me to look?